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By ECF

June 16, 2023

Hon. Jodi W. Dishman
United States District Judge
U.S. District Court for the Western District of Oklahoma
William J. Holloway, Jr. United States Courthouse
200 N.W. 4th Street
Oklahoma City, OK 73102

**Re: *Bridge, et al. v. Oklahoma State Department of
Education, et al.*, No. CIV-22-787-JD (W.D. Okla.)**

Dear Judge Dishman:

We represent Plaintiffs Andrew Bridge, Mark Miles, and Sarah Stiles in this matter. We write to update the Court on certain recent developments concerning Andrew Bridge and Sarah Stiles.

Andrew Bridge graduated from Noble High School last month. Andrew will be attending college this fall at the University of California, Santa Cruz and participating in a pre-semester program at that university beginning in July 2023. Sarah Stiles and her family recently moved from Oklahoma to Colorado due to the discrimination and hostile environment she has experienced in Oklahoma based on her gender identity, including as a result of SB 615, which Plaintiffs challenge in the instant litigation.

Plaintiffs do not believe that these developments materially impact either Plaintiffs' pending motion for preliminary injunction, Dkt. 24, or the State Defendants' pending motion to dismiss, Dkt. 47. Mark Miles remains a student at an Oklahoma public school operated by Moore Public Schools and continues to face discrimination based on his gender identity. Additionally, each plaintiff seeks nominal damages against all Defendants based on their claims under the Equal Protection Clause and Title IX. *See Uzuegbunam v. Preczewski*, 141 S. Ct. 792, 799–802 (2021) (claim for nominal damages for violation of students' constitutional rights averts mootness); *Grimm v. Gloucester Cty. Sch. Bd.*, 972 F.3d 586, 604–05 (4th Cir. 2020) (same in Title IX challenge to prohibition on transgender student accessing restrooms that match his

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gender identity); *Utah Animal Rights Coal. v. Salt Lake City Corp.*, 371 F.3d 1248, 1257–58 (10th Cir. 2004) (even a request for “nominal damages in the sum of one dollar” defeats mootness).

Respectfully submitted,

/s/ Isaac D. Chaput
Isaac D. Chaput

cc: Counsel of Record (by ECF)